

Federal Communications Commission
445 12th Street SW
Washington, DC 20554
Comments regarding 3.7 GHz Band Petition for Rulemaking (RM-11791)

July 24, 2017

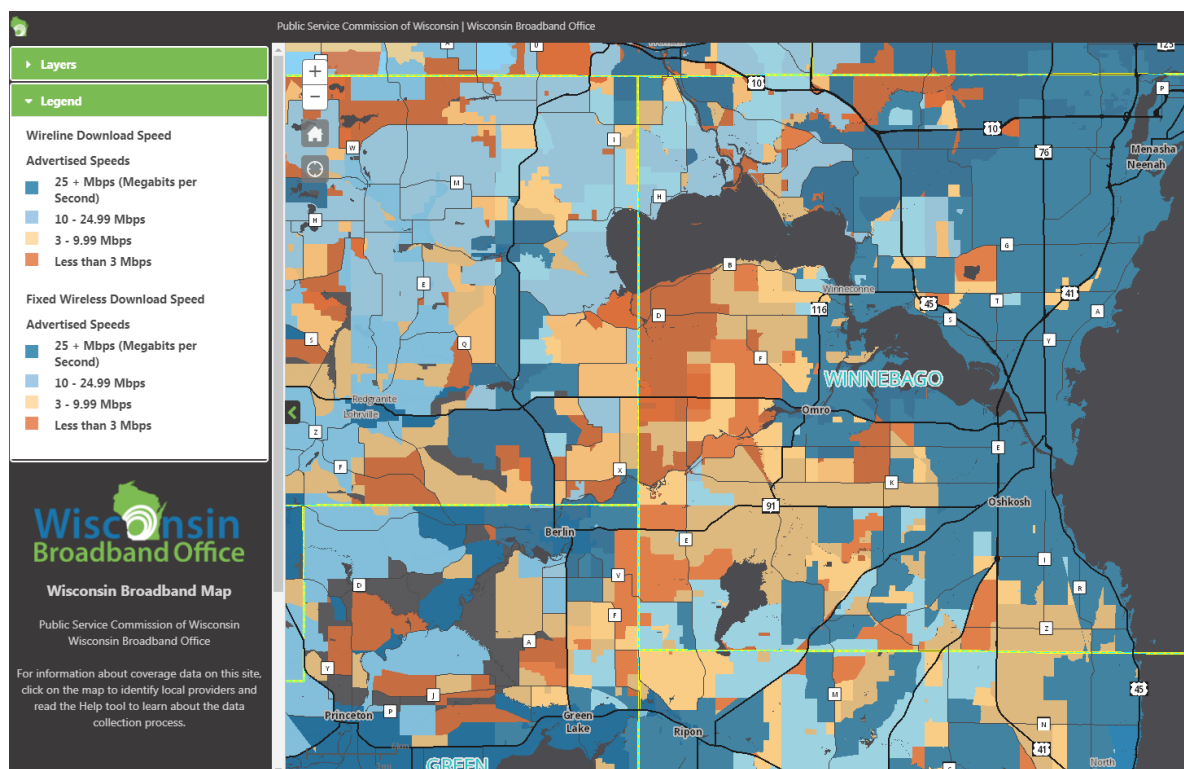
Dear Commission:

We are writing in support of the petition put forth by the Broadband Access Coalition to open the 3700 – 4200 MHz spectrum. We believe that this is a petition that would make the use of this spectrum fair to all parties.

Northern Telephone & Data Corp is based out of Oshkosh, Wisconsin. We provide telephone and internet service in Oshkosh and Appleton, as well as rural point to multi-point rural service outside these cities. We have spent 15 years pushing the boundaries of high speed internet access in rural areas. Despite the internet being widespread throughout the world, there are many rural areas here in Wisconsin that still don't have access to more than one or two reliable high speed internet providers.

Focusing on the area we serve, most residents west of Oshkosh and Omro do not have access to speeds higher than 10 Mbps and many can't get speeds higher than 3 Mbps

(<http://broadbandmap.wisconsin.gov>):



Our wireless point to multi-point customer base is currently over 1,000 subscribers, but the lack of viable spectrum available has hindered our growth in recent years. We currently utilize the 5 GHz, 2.4 GHz, and 900 MHz spectrums and the bands have become quite congested and saturated. Access to the 3700 – 4200 MHz spectrum for P2MP services would enable us to continue to grow and serve rural customers that do not have many options for high speed internet service.

Aside from the congestion of the 5 GHz spectrum, the required line of sight is a hindrance to our ability to service potential customers with foliage. The lower frequencies of 3700 – 4200 MHz provide more effective tree penetration that would greatly help us reach more customers.

If the 3700 – 4200 MHz spectrum is auctioned off, this would be cost prohibitive to our business. As a smaller company, we do not have the funds to outbid large corporations for spectrum licenses. The proposed rules in this petition are a fair alternative to large corporate auctions. We hope the FCC will side with a plan that is fair to all businesses, large or small in the interest of fair competition.

Sincerely,

A handwritten signature in black ink, reading "Jeff Coonen". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Jeff Coonen
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